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January 29, 2015

***VIA ELECTRONIC SUBMISSION***

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW – Lobby Level
Washington, DC 20554

**Re: *Protecting and Promoting the Open Internet; Framework for Broadband Internet Services*; GN Docket No. 14-28; GN Docket No. 10-127**

Dear Ms. Dortch:

On January 28, 2015, Bob Quinn, Gary Phillips, Christopher Heimann, and I, on behalf of AT&T, met with Jim Schlichting of the Wireless Telecommunications Bureau, Matt DelNero and Claude Aiken of the Wireline Competition Bureau, and Marcus Maher of the Office of General Counsel. During the meeting, we discussed the above-referenced proceedings.

We recommended that the Commission not expand the transparency requirements that it adopted in its 2010 Open Internet Order. We pointed out that AT&T and other ISPs already provide substantial information about their broadband Internet access services to customers and third parties. If, however, the Commission does adopt expanded transparency requirements, it should impose those requirements on all entities that possess the type of information included in such expanded requirements. For example, it recently came to light that a transit provider, Cogent, had deprioritized certain traffic, including traffic associated with Netflix's video service. ISPs other than Cogent did not know about this practice and could not have disclosed it to their customers.

We pointed out that recent criticism of the approach taken in the 2010 Order to so-called specialized services is utterly misplaced. The use of broadband platforms to provision multiple IP services to customers is enormously beneficial to those customers and to investment. Without the opportunity to offer services like IP video, broadband providers would invest less and consumers would pay more for broadband Internet access. Moreover, since according to reports the Commission is pursuing reclassification of broadband Internet access service under Title II of the Communications Act, the Commission could not possibly purport to apply any rules adopted pursuant to that reclassification on other services that it has not similarly reclassified. There is no basis on which the Commission could reclassify a generic group of services.

We explained that even if the Commission incorrectly found that so-called interconnection services, like peering and on-net transit, are not information services, it could not subject those services to common carrier regulation. They are, if anything, offered on a private carriage basis and the Commission may not treat private carriers as common carriers.

Pursuant to section 1.1206 of the Commission's rules, this letter is being filed electronically with your office for inclusion in the public record of the above referenced proceeding. If you have any questions or need additional information, please do not hesitate to contact me.

Sincerely,

Henry G. Hultquist

CC: Jim Schlichting
Matt DelNero
Claude Aiken
Marcus Maher